

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
GREENWOOD DIVISION

UNITED STATES OF AMERICA)	CR. NO.: 8:23-0749
)	
)	
-vs-)	MOTION TO FILE
)	SENTENCING MEMO
)	AND EXHIBIT(S) UNDER
J. CHRISTOPHER MCCASLAN)	SEAL

COMES NOW, the Defendant, J. Christopher McCaslan, who moves the Court to allow him to file under seal his sentencing memorandum, exhibit(s) thereto, and request for downward variance. The Defendant makes this request to protect his privacy interests as well as the privacy interests of those mentioned in his sentencing memorandum who are not parties to this case. Most relevant, the memorandum references sensitive medical information of a non-party. The privacy interests of the individuals involved outweigh the public's interest in access to this material. This Court has inherent authority to seal these documents. *Baltimore Sun v. Goetz*, 886 F.2d 60 (4th Cir. 1988); *In re Application of the United States for an Order Pursuant to 18 U.S.C. Section 2703(D)*, 707 F.3d 283 (4th Cir. 2013).

Based on the important interests at stake and the Court's authority in these matters, the Defendant respectfully requests the Court allow the memorandum, related exhibit(s),

and motion for variance to be filed under seal. The Defendant has conferred with the Government, and the Government consents this request.

Respectfully submitted,

s/ Andrew B. Moorman, Sr.
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